FILED IN OPEN COURT U.S.D.C. - Atlanta

SEP 15 2020

JAMES N. HATTEN, Clerk Deputy Clerk

IN THE UNITED STATES DISTRICT COURT' FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

UNITED STATES OF AMERICA

v.

NICHOLAS JOSEPH TINDALL

Criminal Indictment

No. 1 20 - CR - 3 5 7

UNDER SEAL

THE GRAND JURY CHARGES THAT:

Between on or about February 18, 2020, through on or about February 20, 2020, in the Northern District of Georgia, the defendant, NICHOLAS JOSEPH TINDALL, willfully and knowingly made and caused to be made a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of a department and agency of the United States, that is, the United States Department of Justice, Federal Bureau of Investigation ("FBI") during an investigation involving domestic terrorism. In particular, the defendant stated and represented to FBI agents, whom he knew were conducting a criminal investigation involving potential attacks upon United States citizens and infrastructure, including water and electricity facilities, that he had not participated in discussions about attacking United States infrastructure, including water and electricity facilities, when, as the defendant then well knew, he had participated in such discussions with others about attacking United States

infrastructure, including water and electricity facilities, in violation of Title 18, United States Code, Section 1001(a)(2).

X

A The BILL

FOREPERSON

BYUNG J. PAK
United States Attorney

Ryan K. Buchanan

RYAN K. BUCHANAN

Assistant United States Attorney
Georgia Bar No. 623388

Met Com

MATTHEW S. CARRICO
Assistant United States Attorney
Georgia Bar No. 538608

600 U.S. Courthouse 75 Ted Turner Drive, S.W. Atlanta, GA 30303 404-581-6000; Fax: 404-581-6181